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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM MICHAEL TOOMBS,

Defendant.

3:19-cr-00011-HDM-WGC

Notice of Expert Testimony

The United States of America, by and through the undersigned, hereby gives notice of intent to call an expert witness regarding computer forensic analysis, forensic examinations of digital devices, online investigations, offender characteristics, peer-to-peer file sharing programs, and online social media and chat networks.

SUMMARY OF EXPERT WITNESS OPINION & QUALIFICATIONS

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the Government gives notice of its intent to call Detective Gregory Sawyer of the Washoe County Sheriff's Office who is currently assigned to the Northern Nevada Cyber Center.

Pursuant to Rule 702 of the Federal Rules of Evidence, the Government intends to call Detective Sawyer to provide expert witness testimony regarding the peer-to-peer file sharing

1 program and associated internet technology at issue in this case. Detective Sawyer's testimony
2 will include general computer forensics, peer-to-peer file sharing networks, online distribution
3 and sharing of child pornography, and other computer issues related to online child pornography
4 investigations. Detective Sawyer is also expected to provide expert testimony and explanations
5 regarding the process for downloading and using the online social media and chat network, and
6 peer-to-peer file sharing programs, the set-up process, the sharing capabilities and other aspects of
7 these programs that will assist the jury in understanding the computer technology at issue in this
8 matter and how the defendant distributed, received, and possessed child pornography.

9 All of the electronic devices seized from the Defendant and examined by the
10 Government's other noticed expert have been made available to the defendant and his former
11 standby defense counsel and forensic investigator. Detective Sawyer's expert testimony will be
12 based upon his lengthy experience as a detective and task force officer working cases involving
13 internet crimes against children. Detective Sawyer's curriculum vitae is attached as "Exhibit A"
14 to this Notice.

15 Accordingly, the Government provides notice of its intent to call Detective Sawyer as an
16 expert witness in the Government's case-in-chief.

17 DATED this 13th day of January, 2020

18 Respectfully submitted,

19 NICHOLAS TRUTANICH
20 United States Attorney

21 /s/ Peter Walkingshaw
22 PETER WALKINGSHAW
23 Assistant United States Attorney
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CERTIFICATE OF SERVICE

It is hereby certified that pursuant to LCR 47-4 service of the foregoing **Notice of Expert Testimony** was made through the Court's electronic filing and notice system (CM/ECF) addressed to the following:

Robert E. O'Brien III
Robert_O'Brien@fd.org

DATED this 13th day of January 2020.

/s/ Peter Walkingshaw
PETER WALKINGSHAW